

March 11, 2016

VIA EMAIL AND HAND DELIVERY

UTAH PUBLIC SERVICE COMMISSION Heber M. Wells Building 160 East 300 South, 4th Floor Salt Lake City, Utah 84111

Re: Docket No. 15-035-61: In the Matter of the Application of Rocky Mountain Power for Approval of its Subscriber Solar Program (Schedule 73)

Background

On February 25, 2016 Rocky Mountain Power (Company) filed proposed changes to tariff Sheet No. 73.1 of Schedule 73, the Subscriber Solar Program Rider, with the Public Service Commission (Commission). On February 25, 2016 the Commission issued a notice of filing and comment period inviting initial comments from any interested party regarding the Company's proposed tariff revisions on or before March 11, 2016 and reply comments no later than March 18, 2016. The Company's proposed revisions to the tariff are in response to the Commission's October 21, 2015 Order which noted that the Office of Consumer Services (Office) had identified an outstanding issue related to Electric Service Schedule No. 23 customers who opt to participate in Schedule 73. In comments filed on August 12, 2015 the Office noted its intention to review the Company's proposed program implementation as it relates to Schedule 23 participants. Utah Clean Energy appreciates the opportunity to provide comments regarding proposed changes to tariff Sheet No. 73.1

Comments

The First Revision of Sheet No. 73.1 filed by the Company on February 25, 2016 proposes a reduction in the Solar Block Delivery Charge for Schedule 23 customers who opt to participate in Schedule 73. The purpose of this reduction is to reflect distribution revenue from the Power Charge which applies to Schedule 23 customers with demand in excess of 15 kW.

Conclusion

Utah Clean Energy recommends that the Commission approve the Company's proposed tariff Sheet No. 73.1 of Schedule 73, the Solar Subscriber Program Rider.

Sincerely,

Kate Bowman

Solar Project Coordinator

Kate Bonnin

CC:

Jeff Larsen, Rocky Mountain Power Bob Lively, Rocky Mountain Power Joelle Steward, Rocky Mountain Power Chris Parker, Division of Public Utilities Artie Powell, Division of Public Utilities Michele Beck, Office of Consumer Services Cheryl Murray, Office of Consumer Services